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Jack D. Osman, Ph.D.
Professor of Health Science
Towson University

October 18, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexandria, VA 22302

Dear Food Pyramid Committee:

I have been teaching about the Food Guide Pyramid for years. During that time I have noted flaws in the visual representations and have developed a 21st Century Food Pyramid that I have been using during my instructional process.

For what it is worth, I share it with you.

•First, alcohol needs to be added into the "extras" area. I realize the debate about alcohol being a non-food item, but Americans average 3% of their caloric intake from alcohol. (Towson University students are not content just being average!) Perhaps school aged children don't need to see alcohol in the food pyramid, but the truth is that they see it consumed in the home and advertisements in the media.

•Each level of the pyramid needs a "strongly recommended" suggestion *(geared to improving nutrient density through wise selections)* like noted for the Extras Group -- *Use sparingly.*

- *•Grains: Use WHOLE grains 75% of the time*
- *•Fruits and Vegetables: Use the whole, raw form – when possible.*
- *•Meats and Milk: Use low fat forms.*

•Visuals need to be updated to reflect wise, nutrient dense choices!

- •Whole grain breads/cereals, muffins, pita bread, etc.
- •Vegetables/fruits need to include pictures of the best nutrient contributors within particular groups (SWEET POTATOES, broccoli in the vegetable group!)
- •Low fat labels (1% milk) need to be displayed.
- •Lean meats, yes, but also more legume emphasis
  Noteworthy too, are egg whites for fat-free quality protein

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•Canada uses a rainbow guide. The nice thing about it is the additional space it provides for visuals/graphics/pictures. It also promotes the visual concept of color variety. I like the recommendation from Japan, too. They recommend 30 different foods/colors per day. (If this number seems too high, we could emphasize the alphabet variety of fruits/vegetables and encourage 26 different items, like the alphabet.) If we are going to move the nation to a higher level of phytochemicals, this encouragement will do it.

•I have heard rumors that future recommendations will be encouraging individuals to eat 7 fruits and vegetables per day (eventually moving them to 9). Data suggest that the average American is currently only doing 2.3 servings/day. The Five a Day campaign needs some help! Shoe-string French fries don't count!

•Philosophically, I believe the nation's guide needs to be relative pure, unadulterated foods, not "fake, frivolous, fabricated foods" like doughnuts and French fries! I object to visually promoting high sugar, high fat and high sodium foods in the pyramid. The guide is coming from the government and NEEDS to be more natural and pure. But, where does the committee draw the line between processed foods, commercially prepared foods, and the 4 F's? (The public will be adequately brainwashed to use the commercial forms through advertisements!)
One thing that could be done – visually – is to show the low nutrient dense foods on the side. Place them in the three-dimensional shaded-side of the pyramid. Do not emphasize them in the front.
What may be needed is a nutrient density rating – a qualifying criteria to make the visual representation list. Some cereals are great (5+ grams of protein and fiber, low sugar, blends of grains, low fat), but others are 40+% sugar and need to be labeled as candy! Pastries are made from grains, yes, but most have such little nutrient density (some pastry flours are not even enriched) that they do not deserve a place in the grains group.

•Visually, the graphic artists have made drastic, implied statistical mistakes!

•Fat dots represented in the meat group (which is understandably physically crowded for space) visually suggests that fats are not too much of a problem in this group. However, we know that 42% of all the fats Americans typically eat are found in the meat **group** (34% - just in the flesh sources)! Typically there are only 7 to 9 dots in the meat group. How unfair to the grains! We know that about 1.5% of all the fats Americans eat are found in the grains – *in their natural form!* Count the grain fat dots. There are usually 6 to 8 dots – all spread out and not looking like much – but implying that grains have nearly the same amount of fat as foods from the meat group! Milk sources typically have 13% of all the fats Americans consume. Are there sufficient dots there?

•Sugar (sucrose or natural?) is represented with the triangle, but it implies that certain foods (fruits) are very high. Which sugar are we dealing with? High fructose corn syrup? Added table sugar? Sugar added to cereals? The public is becoming more nutritionally aware and sophisticated. They need/thirst for additional accurate information and clarification. Let's feed them.

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•At the very base of the pyramid – below the grains – could be a graphic reminder for water, plain old water. From a weight/volume point of view water FAR outweighs any other substance in the pyramid. From a bodily NEED point of view, we can't live much past five days without it. From a cell-level point of view hydrolysis doesn't happen efficiently unless the water is inside of the cell.

I hope I haven't bored you all. I have many other suggestions for presenting the pyramid.

I am a health educator. I've been teaching at Towson University for 33 years. I write wellness articles, many of which focus on nutrition. I have a minor in nutrition from University of Maryland and did my thesis on nutrition misinformation.

If it would be of any value, I could come to a meeting and brainstorm with you. I'm just North of Baltimore. My forte' is creative alternatives.

Sincerely,

Jack D Osman

Jack D. Osman

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THE OHIO STATE UNIVERSITY EXTENSION

Ohio State University Extension
Cuyahoga County

received
10/23/03
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Memorandum

To: Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion

From: Expanded Food and Nutrition Education Program
The Ohio State University Extension, Cuyahoga County, Ohio

Date: 10/20/2003

Re: Revisions to the Food Guide Pyramid

Thank you for taking suggestions from the public in regards to the revisions that should be made to the food guide pyramid. As nutrition educators for the Expanded Food Nutrition Education Program (EFNEP) working in Cuyahoga County, Ohio, we have found that the current food guide pyramid is a useful tool to educate our clientele; however, listed below you will find several suggestions that we believe would make the pyramid more user-friendly.

1. Although the tip of the pyramid, consisting of fats, oils, and sweets, recommends that these foods be used sparingly we have found that our clientele have difficulty determining what the terminology means. We are purposing that an upper limit be created so that the general public can define what **sparingly** refers too. In addition, the tip of the pyramid should also separate unsaturated fatty acids from saturated fatty acids and trans fatty acids, so that the public is aware that there is a difference.

2. The tip of the pyramid should include pictures of specific foods that are high in fats and sugars that the public should attempt to avoid. The circles and triangles that are currently present are not very helpful when trying to make healthy decisions because they are often overlooked.

3. Include water as the base of the pyramid so that people realize that water is an important part of a healthy diet.

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4. Clarity of what a serving size is should also be addressed when creating the new food guide pyramid. Many people do not realize that accompanying the food guide pyramid there is information concerning specific serving sizes that are recommended. It seems that a large percentage of the population believe that one serving size is much larger than the current recommended serving size. The pictures located within each group should also represent an actual serving size. For instance, instead of showing an entire chicken or loaf of bread there should be pictured a drumstick or slice of bread.

5. The food guide pyramid should be structured so that there are more items of food present at the top and fewer at the bottom. This will provide the public with a visual of what their actual daily diet should look like.

6. The revision should also stress the importance of incorporating exercise into the lifestyle of Americans. This could be done by adding images outside of the pyramid of people exercising, or by simply writing a statement on the importance of exercise.

7. The grain group should emphasize the importance of whole-wheat grains, rather than just simply grain products.

8. Print the pyramid such that it is easy to duplicate on in-house machines.

Thank you for considering these suggestions.

Prepared by Kellie Short, Case Western Reserve University, Public Health Nutrition Graduate Student

Jean Mayer
United States Department of Agriculture
Human Nutrition Research Center on Aging
At Tufts University

Office of the Director

October 15, 2003

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Food Guide Reassessment Team
Eric Hentges, PhD
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302.

Dear Dr. Hentges:

I submit this letter is in response to the USDA's technical report from your team on Daily Food Intake Patterns and Technical Support Data. I applaud the USDA for their continued dedication and effort to provide dietary guidance to promote healthful eating among Americans. The Food Guide Pyramid and the Dietary Guidelines for Americans are critical components of U.S. public health policy. Their content should direct consumers to select foods which can help promote health and reduce the risk for chronic disease. Thus, the revised Pyramid and Guidelines should move consumers beyond their current dietary patterns toward more healthful, nutrient-dense choices. A substantial body of scientific evidence suggests that dietary patterns characterized by a generous intake of vitamin E are associated with a reduced risk of several chronic conditions including Alzheimer's disease, some forms of cancer, heart disease, and eye disorders like cataract and age-related macular degeneration. Therefore, the suggestions proffered by the team to lower the target for dietary intake of vitamin E should be reconsidered.

The Recommended Dietary Allowance (RDA) for vitamin E was increased in 2000 by the Institute of Medicine to 15 mg/d for men and women 14 years and older. Importantly, this new RDA defines the requirement for vitamin E as *RRR*-α-tocopherol from food (and the 2*R*-stereoisomeric forms that occur in fortified foods and supplements). However, even employing the lower potency reference of milligrams α-tocopherol equivalents (mg αTE), the NHANES III reveals that mean intakes fall below 9 and 12 mg αTE for females and males, respectively, and that even at the 75th percentile of vitamin E intake, no one is meeting the RDA.

The proposed recommendation to lower the target for vitamin E consumption in the Food Guide Pyramid appears based on the need for "substantial changes from typical intakes and would require use of foods not commonly consumed". However, this presumption is unfounded. It is reasonable and feasible for consumers to attain the RDA for vitamin E through healthful foods, particularly nuts and seeds. Including more nuts, for example, does not present a drastic shift in dietary patterns and, for many groups, is a highly palatable choice and consistent with

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virtually all cultural and religious strictures. Nuts are a very rich and healthful source of vitamin E since they also present a good source of other essential micronutrients such as calcium, copper, magnesium, phosphorus, and zinc and vitamin B6 as well as dietary fiber. Daily consumption of one ounce of nuts has been shown in several studies to be associated with a reduced risk of cardiovascular disease. Moreover, the Food and Drug Administration has recently provided a qualified health claim to this effect.

The USDA has encouraged consumption of oils, such as sunflower, safflower and soybean oil to increase vitamin E intake. While the oil from wheat germ, walnuts, and safflower are good sources of vitamin E, it is important to note the more common oil intakes in the U.S. are from corn and soybean which are rich in γ-tocopherol but, in fact, quite poor in α-tocopherol. Further, in contrast to nuts and seed, oils are largely absent other vitamins and minerals and, thus, are more calorie-dense.

It is my expert opinion that revisions to the Food Guide Pyramid and Dietary Guidelines should include a reference to nuts, e.g. almonds, and seeds, e.g., sunflower seeds, as excellent and nutritious dietary sources of natural α-tocopherol to help reach the RDA for vitamin E.

Respectfully submitted,

Jeffrey Blumberg, PhD, FACN
Associate Director and Professor
Chief, Antioxidants Research Laboratory

A. Sambado & Sons, Inc.

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September 22, 2003

Eric J. Hentges, Executive Director
Center for Nutrition Policy and Promotion
Food Guide Pyramid Reassessment Team
USDA CNPP
3101 Park Center Dr. Room 1034
Alexandria, VA. 22302

Dear Mr. Hentges:

RE: Proposed Daily Food Intake Patterns for Food Guide Pyramid

As a grower/shipper/packer and member of the California walnut industry, I am writing to express concern in regard to the Proposed Daily Food Intake Patterns for Food Guide Pyramid. As the government modifies the food guide pyramid, we are pleased that the revision suggests daily intake amounts of essential alphalinolenic acid (ALA), however food sources noted of this essential fatty acid are misleading and incomplete. I realize that the main food sources of ALA in the American diet based on national surveys are canola oils and soft margarines, but as American consumers begin to think about changing their personal dietary choices, they may want to know more about walnuts. Walnuts are unique as one of the only whole food sources of ALA – often thought, as mentioned, to be only in canola oil and canola based soft margarines. In addition, walnuts are also lower in calories and saturated fat than canola oil plus offer protein, fiber and other nutrients. In fact as you know, the Food and Drug Administration (FDA) affirmed the health claim, "*Supportive but not conclusive research shows that eating 1.5 ounces per day of walnuts as part of a diet low in saturated fat and cholesterol may reduce the risk of heart disease. See nutrition information for fat content.*" This FDA decision comes in response to a petition filed by the California Walnut Commission, which highlights a body of international scientific research substantiating the specific benefit of consuming walnuts as part of a heart healthy diet in reducing the risk of heart disease. The body of evidence suggests that the nutritional composition of walnuts contribute to these heart health benefits.

Clearly, further steps need to be taken to place greater emphasis on utilizing walnuts as a rich source of ALA. As a grower/shipped/packer who employs 400 workers directly and indirectly, I hope the USDA will join the U.S. Food and Drug Administration, the food Nutrition Board of the National Academy of Sciences and other recognized agencies such as the American Heart Association in acknowledging the health benefits derived from the ALA in walnuts as they make their revisions to the Food Guide Pyramid.

I urge you to please consider this recommendation.

Thank you for your efforts!

Sincerely,

Lawrence Sambado

Lawrence Sambado

The Other White Meat.

National Pork Board

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received 10/23/03 KT

October 22, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302-1594

Dear USDA Team,

I am writing on behalf of the National Pork Board in response to the Federal Register notice Vol. 68, No.176 posted on September 11, 2003 regarding the solicitation of comments for the proposed revisions to the daily food intake patterns of Americans.

As a commodity organization representing America's pork producers, the National Pork Board educates consumers about the nutritional attributes of pork and how pork can fit into a healthful lifestyle. In response to consumer demands for lower fat meats, pork producers now market a product that is 31% lower in fat, 29% lower in saturated fat and 14% lower in calories compared to 20 years ago[1].

With the availability of lower-fat products, studies have shown that lean cuts of pork can be beneficial in a lipid-lowering diet. It is unnecessary to substitute poultry or fish for beef, veal or pork to achieve desirable blood lipid levels[2,3].

In addition, pork is a rich source of protein, iron, zinc, vitamin B_6, vitamin B_{12}, thiamin, riboflavin and niacin. As you know, the research on protein's role in the diet has advanced greatly in the previous five years. Emerging research is showing the importance of high-quality protein to stabilize blood glucose levels during weight loss[4].

The Pork Board educates consumers with positive advice on how to enjoy their favorite foods, such as lean pork. In the enclosed consumer research conducted by the National Pork Board, more than 84 percent of respondents correctly knew that several pork cuts are as lean as skinless chicken, a positive finding for Americans looking for options within the current Meat, Poultry, Fish, Dry Beans, Eggs & Nuts Group.[5]

The Pork Board research confirmed the need to examine consumer motivators and barriers to improving health through food choices. Sixty-four percent of respondents said their diet greatly contributes to their overall health, but the vast majority of respondents – 78 percent – admitted their diet needs changes or adjustments.

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Following a thorough review of the proposed daily food intake patterns and the supporting technical data for the Food Guide Pyramid, the following recommendations pertaining to our product are supported by research:

- Recommendation of two to three servings of meat a day.
- Recommendations of 300 mg or less of cholesterol; saturated fat of less than 10% of calories; and 2400 mg or less of sodium.

Individuals of different ages, genders and activity levels require different caloric and nutrient needs for health, however, any message points or common graphic to communicate those goals needs to be well tested by consumer research before dissemination.

As an organization committed to educating consumers about the nutritional benefits of pork in the context of a balanced diet, we thank you for this opportunity and look forward to providing additional technical input on future stages of the Pyramid review.

Sincerely,

Ceci Snyder

Ceci Snyder, MS, RD
National Pork Board

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[1]Buege, DR, et al. A nationwide audit of the composition of pork and chicken cuts at retail. *J. Food Composition Anal.* 11(3):249-261, 1998.

[2]Davidson MH, et al. Comparison of the effects of lean red meat vs. lean white meat on serum lipid levels among free-living persons with hypercholesterolemia. *Arch Intern Med.* 159:1331-1338, 1999.

[3]Hunninghake, DB, et al. Incorporation of lean red meat into a National Cholesterol Education Program Step 1 Diet: a long term, randomized clinical trial in free-living persons with hypercholesterolemia. *J Am Coll Nutr.* 19:351-360, 2000.

[4]Layman DK. The role of leucine in weight loss diets and glucose homeostasis. *J Nutr.* 261S-267S, 2003.

[5]Final Report: Pork Board Health Concerns Survey. Impulse Research Corporation. Los Angeles, CA. Conducted May 30, 2003.